



# LUNDY FIELD SOCIETY

*for the study and conservation of a unique island*

Established 1946  
Registered Charity 258297  
[www.lundy.org.uk](http://www.lundy.org.uk)

Atlantic Array Offshore Wind Farm  
RWE npower renewables  
Auckland House  
Great Western Way  
Swindon  
SN5 8ZT

31st August 2012

Dear Sirs,

## **Proposed Application for Development Consent to construct and operate an Atlantic Array Offshore Wind Farm under Section 42 of the Planning Act 2008 and Regulation 10 of the EIA Regulations**

The Lundy Field Society was founded in 1946 and has the objects:

- a. To further the study of Lundy and in particular its history, natural history and archaeology;
- b. To undertake investigations in these fields;
- c. To further the conservation of wildlife and antiquities of the island.

In addition to being a learned society with considerable expertise in many aspects of biology and conservation, the Lundy Field Society (LFS) also acts on behalf of its members (approximately 500 people) who value Lundy for its wild and remote landscape and its unique value as a 'place apart'. At our last AGM in March 2012, many members were very concerned about the proposals for the Atlantic Array and expressed considerable disquiet about its visual impact in particular.

Our concern is of potential disturbance of wildlife and of disruption to the peace, tranquillity and sense of isolation for which our members value the island and its seascapes.

### **Construction phase**

It is the construction phase of the proposed development that gives us particular concern with regard to wildlife.

Any prolonged construction phase (several years) will cause noise disturbance especially for mammals (including humans). That noise may not be great above water but is likely to be loud and travel great distances underwater resulting in disturbance especially to mammal populations around Lundy and in the wider Bristol Channel area. We have seen the detailed submission has been made by the Cornwall Seal Group and the material submitted by the National Trust. We will make no additional comment.

In 1896-97, as a result of the disruption caused by building the Lundy North lighthouse, there was an exodus of the breeding colony of Gannets from Lundy. One hundred and sixteen years later they have still not returned to breed.

The Society is concerned that that the diverse benthic communities of marine organisms on the sea floor around Lundy may be adversely affected by the release into the water column of sediments and pollutants (including ones re-mobilised by sediment disturbance). It seems that a considerable amount of sediment may be excavated at the proposed construction site and that a resultant plume from disposal of that sediment may reach the island and affect the seabed surrounding Lundy within the Marine Conservation Zone and Special Area of Conservation. Chemicals that are used as lubricants and from other construction activities are also a concern. The Society feels that, unless the developers can

**Dr Keith Hiscock, Chairman**  
Garden Cottage, 6 Railway Cottages, Plymouth, PL9 7PX  
Tel: 01752 406697 Email: [keith.hiscock@lineone.net](mailto:keith.hiscock@lineone.net)

**Mr Michael Williams, Honorary Secretary**  
5 School Place, Oxford, OX1 4RG  
Tel: 07968 598846 Email: [michael@oldlight.co.uk](mailto:michael@oldlight.co.uk)

show that disturbed sediments and any potential pollutants will not reach Lundy, the North Atlantic Array construction should not be allowed to go forward.

### **Operational phase**

We have read relevant reports commissioned in relation to the proposed development and reports and papers relating to wildlife in the vicinity of established offshore wind farms. There are clearly many uncertainties in trying to predict effects of the presence of turbines and associated structures but we feel that bird and mammal populations in particular may be adversely affected.

LFS members include many ornithologists and some of the concerns that we have for the Manx Shearwater colonies are presented in Annex 1 to this letter.

### **Sustainability of Lundy**

The LFS is concerned about unforeseen adverse consequences that ensue as a direct result of the installation of the proposed Atlantic Array.

During the building of the Array, any effects on the flora and fauna of Lundy will affect the decision of naturalists to select Lundy as a location for their studies. This will directly affect the objectives of the LFS.

After completion, the perceived loss of wilderness that the Array gives by its unavoidable presence on the northern horizon will affect the number of visitors who travel to Lundy to "get away from it all". This will have a knock-on effect on the viability of Lundy as a holiday destination and may affect the ability of the National Trust to maintain the Island in its current unspoilt state.

The LFS recruits its membership from professional, semi-professional and amateur naturalists. Any reduction in the diversity of species, habitats and number of naturalists will adversely impact the viability of our Society.

### **Visual amenity**

The view of the Array has been described as a white picket fence to the north-east of Lundy. The photomontages showing its appearance from various points on the Island may be technically correct but they inevitably underestimate its perceived effect; in the real world the brain does a subjective 'zoom in' to the area of interest or concern and the Array will be a huge visual intrusion. At night, the red aircraft warning lights will be a constant reminder that an industrial installation is only a few kilometres away, in an area which is currently empty and wild.

### **Capacity and benefits**

The LFS is not against the development of offshore wind power *per se* and we endorse the need for electricity generation which is CO<sub>2</sub>-free. The generation potential of the Atlantic Array is unclear – which itself is unsatisfactory– but representatives of RWE npower at the public meeting on Lundy on 7th August acknowledged that the general effectiveness of this scheme would be about half that of a conventional power station of the same installed capacity.

The Atlantic Array is the wrong scheme, in the wrong place, with unclear environmental and financial benefits, but with obvious and significant environmental and financial costs.

On behalf of our members, the Lundy Field Society strongly objects to the proposed development.

Yours sincerely



Dr Keith Hiscock  
Chairman



Mr Michael Williams  
Honorary Secretary

## Annex 1 – Manx Shearwaters

As correctly stated in paragraph 10.84 of the Draft Environmental Statement, the UK has international responsibility for Manx Shearwater, an ‘amber-listed’ species of conservation concern that is vulnerable to localised impacts due to its concentration on a few offshore islands. Lundy supports one of England’s most important colonies of breeding seabirds and is of increasing importance for Manx Shearwaters, numbers of which have grown rapidly (and continue to do so) since the eradication of rats from the island in 2004. Paragraph 10.87 erroneously dismisses Lundy as having a “small population” of shearwaters, whereas the population may now number thousands of pairs. The background research for the Environmental Statement should have included a full census of Lundy’s breeding shearwater population and taken into account projected future growth of the colony, which appears to be continuing to increase rapidly. The HRA should address this shortcoming.

Further GPS tracking studies of Lundy’s breeding Manx Shearwaters undertaken by the University of Oxford in 2010, 2011 and 2012 but not referenced in paragraph 10.87, have strengthened the evidence base that the waters close to the island and in the wider Bristol Channel, including the proposed footprint of the Atlantic Array, are used for feeding and resting by Lundy’s shearwaters.

While Manx Shearwaters typically fly just above the wave surface and are therefore at very low risk of collision with wind-turbine blades (as correctly assessed in paragraph 10.192), they are primarily birds of open seas and may be vulnerable to displacement from the entire Atlantic Array area, given the large number and high density of turbines proposed. Such displacement could constitute a significant loss of feeding and resting areas for Lundy’s Manx Shearwaters. Unfortunately this is not considered in paragraphs 10.204 and 10.205, which comment only on impacts on the national population and on the Skomer & Skokholm colonies. The assumptions underlying the conclusions drawn in paragraphs 10.204 and 10.205 are also open to question.

Paragraphs 10.90 to 10.93 do not take sufficiently into account that preferred foraging and resting areas for shearwaters are likely to vary considerably within and between years, given (for example) changes in water temperature, turbidity and prevailing weather. It is likely that at certain times the proposed area for the Atlantic Array is even more important than that suggested by the limited (though nevertheless welcome) aerial and boat-based surveys conducted. Paragraph 10.93 recognises that: *“The predominant risk of the development of the Atlantic Array to Manx shearwater is thought to be displacement during both construction and operation, or through indirect effects on fish populations during construction that could affect individual foraging success and thus ultimately have population consequences.”*

By acting as artificial perches for predators, including Great Black-backed Gulls and Peregrines, there is also potential for increased disturbance and predation of resting and feeding Manx Shearwaters, in the event that shearwaters continued to use the waters within the Atlantic Array.

The Lundy Field Society therefore remains concerned that the Atlantic Array could have significant impacts on Lundy’s breeding Manx Shearwaters (and potentially other seabird species) and that no convincing case to the contrary, supported by scientific evidence, has yet been made. At the time of writing, no large offshore wind farm has been constructed close to a significant Manx Shearwater breeding colony. Comparative observations from existing offshore wind farms elsewhere in Britain and northern Europe are therefore likely to be of limited value and applicability.